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August 16, 2021

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Hon. Alvin K. Hellerstein  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *News Corp. v. CB Neptune Holdings, LLC et al.*, No. 21 Civ. 04610 (AKH)  
Request to File Under Seal and Maintain Limited Redactions

Dear Judge Hellerstein:

Pursuant to Rule 4.B.ii. of your Honor's Individual Rules ("Individual Rules"), I write on behalf of Defendants CB Neptune Holdings, LLC and CB Neptune Promotions Inc. (collectively, "Neptune") to respectfully request that the Court order the sealing of an unredacted version of Neptune's Reply Memorandum of Law in Support of Their Motion to Compel Arbitration and, in the Alternative, Their Motion to Dismiss (the "Brief"). A public redacted copy of the Brief is being filed on the docket in connection with this sealing request.

Neptune seeks to redact only the specific financial dollar adjustment figures that Neptune had also previously redacted in its opening motion. Neptune incorporates by reference all arguments made in support of its previous Letter-Motion to Seal (*see* ECF No. 15), which was made with News Corporation's consent and was granted by this Court (*see* ECF No. 25). Neptune respectfully requests that this Court enter an Order: (1) sealing the unredacted version of the Brief, and (2) maintaining the limited redactions of the publicly filed version of the Brief. News Corporation consents to sealing here as well.

If this request is acceptable to Your Honor, a So Ordered line is included for the Court's convenience.

Respectfully submitted,

s/ Eric S. Hochstadt  
Eric S. Hochstadt

cc: All counsel via ECF

**SO ORDERED:**

Dated: August 17 2021

/s/ Alvin K. Hellerstein

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Honorable Alvin K. Hellerstein  
U.S. District Court Judge